

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: : Chapter 11
W.R. Grace & Co., *et al.*, : Case No. 01-01139-JKF
Debtors. : Jointly Administered
: Related Docket No. 20378

**JOINDER OF THE COONEY & CONWAY CLAIMANTS IN THE RESPONSE AND
OBJECTION OF THE MMWR FIRMS TO LIBBY CLAIMANTS' MOTION TO
COMPEL AND TO LIBBY CLAIMANTS' DOCUMENT REQUEST**

NOW COME the plaintiffs represented by the law firm of Cooney & Conway, and hereby join the Responses and Objections of The MMWR Firms¹ to the Libby Claimants' Motion to Compel Debtors to Respond to Libby Claimants' Document Request (the Libby Claimants' "Motion"). Cooney & Conway Plaintiffs incorporate herein as though fully set forth all factual recitations and legal arguments and authorities set forth in the motion of The MMWR Firms.

On August 12, 2005, this Court entered its Order approving the Debtor's Personal Injury Questionnaire (the "Questionnaire"), and requiring all asbestos personal injury claimants (the "Claimants") to complete and return said Questionnaire. Certain claimants represented by Cooney & Conway completed and returned the Grace questionnaires. Their responses were subject to a protective order entered by this Court. These claimants did not and do not authorize any parties or entities other than those delimitated in this Courts protective orders to have access

¹ For the purposes of this Response, the "MMWR Firms" are defined as follows: (i) Kazan, McClain, Abrams, Fernandez, Lyons, Farrise & Greenwood, A Professional Law Corporation; (ii) Waters & Krauss, LLP; (iii) Paul and Hanley (iv) Early Ludwick & Sweeney; (v) Harowitz & Tigerman; (vi) the Wartnick Law Firm; and (vii) Early & Strauss.

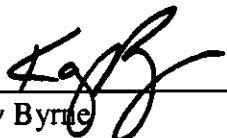
to their medical, financial and other personal information. For the reasons stated in The MMWR Firms' response, plaintiffs represented by Cooney & Conway also object, and therefore, join in The MMWR Firms' motion.

WHEREFORE, Cooney & Conway respectfully request that the Court enter an Order denying in full with prejudice the Libby Claimants' Motion to Compel Debtors to Respond to Libby Claimants' Document Requests.

Dated: January 7, 2009

COONEY & CONWAY

By:



Kathy Byrne
Cooney & Conway
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CERTIFICATE OF SERVICE

I, undersigned, do hereby certify that I have this day electronically filed a true and correct copy of the above and foregoing with the Clerk of the court using the ECF system which sent notification of this filing to all counsel of record.

Dated this January 7, 2009.

/s/ Kathy Byrne

Filed electronically